

MARINE SAFETY INFORMATION BULLETIN

Volume XV Issue: 011

TIME: 13 00

DATE: 12 JAN 2015

**North American Emission Control Area (NA-ECA)**

**Low Sulfur Fuel Oil Changeover Concerns**

The North American Emissions Control Area (NA-ECA) requirement to use 0.1% sulfur content fuel oil went into effect on 01 January 2015. Fuel changeover to comply with the NA-ECA elevates the risk of propulsion loss and vessel operators are reminded that proper maintenance and fuel changeover procedures lower this risk. Vessel operators are encouraged to review ISO Standard 13613, "Ships and Marine Technology maintenance and testing to reduce losses in critical systems for propulsion", sections 3.3.5 and 3.3.6 "fuel switching" for guidance on fuel changeover.

Sector New Orleans has been contacted by senior members of the local maritime industry, flag state representatives, and foreign vessel masters who expressed concern regarding an elevated risk of propulsion loss associated with conducting NA-ECA fuel changeover procedures while navigating in port on restricted waters. The elevated risk of propulsion loss/irregularity associated with conducting a NA-ECA fuel changeover while underway in the Vessel Traffic Service Lower Mississippi River Area has been determined by the COTP to be a Hazardous Condition as defined in 33 CFR 160.204 and shall be reported to the USCG IAW 33 CFR 160.215.

Vessels complying with the new NA-ECA requirements should complete all required fuel changeover procedures well before entering the Lower Mississippi River. However, a number of vessels have entered the Lower Mississippi River since 01 January 2015 which needed to conduct a NA-ECA fuel changeover in port as result of either entering with compliant fuel but not having enough to make both the inbound and outbound transit or not having been able to obtain compliant fuel in previous ports and subsequently being able to obtain compliant fuel in the Greater New Orleans area after entering port.

Due to the concerns regarding an increased risk of propulsion loss/irregularities associated with fuel changeover operations associated with NA-ECA compliance within restricted waters noted above, the COTP has determined that a vessel required to conduct a NA-ECA related fuel changeover after entering the Vessel Traffic Service Lower Mississippi River Area as defined in 33 CFR 161.65(a) has three options:

1. Utilize, for the duration of their operation while in the Vessel Traffic Service Lower Mississippi River Area, the fuel being used upon entering the VTS Area;
  
2. Employ tugs of adequate horsepower to the satisfaction of the attending pilot if the NA-ECA fuel changeover takes place while underway. Note: A vessel employing this option should expect the CG to issue a COTP Order under the authority noted in 33 CFR 160.111(c) mandating the use of tugs;
  

or

3. Conduct and fully complete any required NA-ECA fuel changeover operations dockside or at anchorage.

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Note: If a vessel chooses to enter and operate on the Vessel Traffic Service Lower Mississippi River Area using non-compliant fuel, the COTP will notify the EPA and continue to take appropriate enforcement action in accordance with existing CG policy regarding the use of non-compliant fuel.

Contact the Sector New Orleans Port State Control Branch if additional information or clarification is required.

Coast Guard Sector New Orleans Port State Control: (504) 365-2361 psenola@uscg.mil  
Vessel Traffic Center Lower Mississippi River: VHF Ch: 11, 12, 05A, (504) 365-2514  
Coast Guard Sector New Orleans Command Center: (504) 365-2200

  
**CAPTAIN P.C. SCHIFFLIN**  
**Captain of the Port New Orleans**

For a current list of MSIB's within the COTP New Orleans Zone click: <https://homeport.uscg.mil/nola> under "Safety and Security"